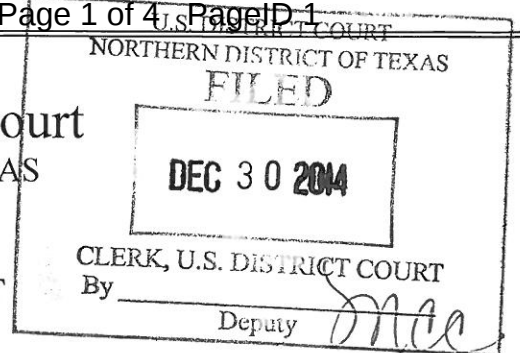


**SEALED**

United States District Court  
NORTHERN DISTRICT OF TEXAS



UNITED STATES OF AMERICA

**COMPLAINT**

V.

**3-14MJ835-BH**

SHAUN SKINNER

CASE NUMBER: 3-14-MJ-

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief: On or about December 29, 2014, in the Dallas Division of the Northern District of Texas, Shaun Skinner, the defendant, did

knowingly and intentionally take, by force and violence, and by intimidation, from the person and presence of another, namely, an employee of Chase Bank, 10321 Lake June Road, Dallas, Texas, United States currency belonging to and in the care, custody, control, management and possession of Chase Bank, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation,

in violation of 18 U.S.C. § 2113(a).

I further state that I am a(n) Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of FBI TFO James L. Thompson, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: X Yes      No

[Signature]  
JAMES L. THOMPSON  
Task Force Officer, FBI  
Dallas, Texas

Sworn to before me and subscribed in my presence, on this 30<sup>th</sup> day of December, 2014, at Dallas, Texas.

IRMA CARRILLO RAMIREZ  
UNITED STATES MAGISTRATE JUDGE  
Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer

AFFIDAVIT

I, James L. Thompson, am a Dallas Police Officer assigned to the Violent Crime Task Force with the Federal Bureau of Investigation (FBI) and primarily investigate bank robberies and Hobbs Act cases. I have been a Dallas Police officer for 24 years and have been assigned to the task force for fifteen months. This affidavit is made in support of a criminal complaint and arrest warrant for Shaun Skinner (BM, date of birth xx-xx-1988) for the offense of bank robbery, in violation of 18 U.S.C. § 2113(a). This affidavit is based on my personal knowledge and information provided to me by other law enforcement officers who participated in this investigation. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included all facts known to me concerning this investigation.

Facts

On December 29, 2014, at approximately 11:38 a.m., a black male suspect robbed the Chase Bank located at 10321 Lake June Road, Dallas, Texas, a location within the Dallas Division of the Northern District of Texas (NDTX). At the time of this robbery, the deposits of Chase Bank were insured by the Federal Deposit Insurance Corporation (FDIC). The Dallas Police Department (DPD) and members of the FBI task force responded to the bank.

S.C., a teller with Chase Bank, was interviewed at the bank. She stated that she was standing behind the teller counter when a black male, who investigators later identified as Shaun Skinner, wearing a gray hoodie and sunglasses entered the bank. She greeted Skinner as he waited for her to assist another customer. She noticed Skinner

looking around and acting nervous. Skinner approached the teller counter and said something to the effect of, "Give me a thousand dollars or I'll shoot somebody!" Skinner handed S.C. a zip-lock type baggie through the window and S.C., being scared and in fear for her life, placed approximately \$2,467 in United States currency in the bag. Skinner took the bag containing the cash and ran from the bank.

A witness observed Skinner run from the bank and enter a tan, four-door vehicle with Texas license plate number DXS0390. The witness called 911 and followed Skinner to a residence at 1815 Greendale, Dallas, Texas. Patrol officers responded to the residence and located the above-described vehicle. Officers made contact with two individuals at the residence who were later transported to police headquarters for an interview.

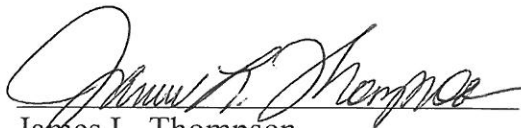
At headquarters, I interviewed T. Strange after he waived his *Miranda* rights. Strange indicated he and Skinner are cousins. Strange said he used the above-referenced vehicle to drop-off Skinner at the bank. Strange said he dropped-off Skinner in front of the bank and then drove across the parking lot to purchase a sandwich at Subway. Strange said he was waiting in the vehicle outside Subway when Skinner ran up to the car and jumped inside. Skinner was out of breath and stated, "I thought I was gonna miss you." Strange stated that he then drove to the residence on Greendale and that Skinner, after removing a gray hoodie and sunglasses and laying them on the car, went inside the house. Strange stated that he did not know Skinner was going to rob the bank and he did not see Skinner enter the car with a bag of money. Strange, who has known Skinner his entire life, was shown a still photo of the suspect inside the bank at the teller window

committing the robbery. Strange positively identified the individual in the robbery photo as Skinner.

At headquarters, I also interviewed J. Bates, who lives at the residence on Greendale. Bates stated that Skinner came into the house, bragged to him about robbing a bank, and wanted Bates to take a picture of him with a large roll of money. Bates stated he went outside the house and was talking to Strange when patrol officers arrived. Patrol officers searched the house for Skinner, but they were unable to locate him.

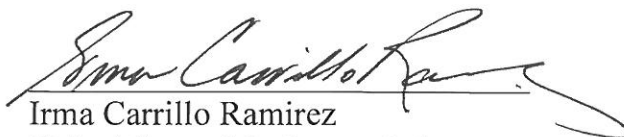
Conclusion

Based on the foregoing facts and circumstances, there is probable cause to believe that on or about December 29, 2014, Shaun Skinner (BM, date of birth xx-xx-1988) intentionally and knowingly committed a violation of 18 U.S.C. § 2113(a), that is, bank robbery, for the robbery of Chase Bank, 10321 Lake June Road, Dallas, Texas, a location within NDTX.



James L. Thompson  
Task Force Officer, FBI  
Dallas, Texas

Sworn to and subscribed before me this 30<sup>th</sup> day of December, 2014.



Irma Carrillo Ramirez  
United States Magistrate Judge  
Northern District of Texas